

Steve W. Berman (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com

Bruce L. Simon (CSB No. 96241)
 PEARSON SIMON & WARSHAW, LLP
 44 Montgomery Street, Suite 1200
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
 bsimon@pswlaw.com

Plaintiffs' Interim Co-Lead Counsel

Rodger R. Cole (CSB No. 178865)
 rcole@fenwick.com
 FENWICK & WEST LLP
 Silicon Valley Center
 801 California Street
 Mountain View, CA 94041
 Telephone: (650) 988.8500
 Facsimile: (650) 938.5200

Tyler G. Newby (CSB No. 205790)
 tnewby@fenwick.com
 Jennifer J. Johnson
 (CSB No. 252897)
 jjjohnson@fenwick.com
 FENWICK & WEST LLP
 555 California Street, 12th Floor
 San Francisco, CA 94104
 Telephone: (415) 875.2300
 Facsimile: (415) 281.1350

Attorneys for Defendant Carrier IQ, Inc.

[Additional Defense Counsel Listed Below]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re Carrier IQ, Inc. Consumer Privacy
 Litigation

This Document Relates to:
 ALL CASES

No. 3:12-md-2330-EMC

JOINT CASE MANAGEMENT
 CONFERENCE STATEMENT AND
 NOTICE OF SETTLEMENT

Date: July 2, 2015
 Time: 10:30 a.m.
 Place: Courtroom 5, 17th Floor
 Judge: Hon. Edward M. Chen

Pursuant to Civil Local Rule 16-10(d), plaintiffs' interim co-lead counsel and counsel for defendants Carrier IQ, Inc., HTC America, Inc., HTC Corporation, Huawei Devices USA, Inc., LG Electronics MobileComm U.S.A, Inc., LG Electronics, Inc., Motorola Mobility LLC, Pantech Wireless, Inc., Samsung Telecommunications America, LLC, and Samsung Electronics Co., Ltd. (collectively, "defendants") submit the following Further Joint Case Management Conference Statement in advance of the Further Case Management Conference currently scheduled for July 2, 2015.

A. SETTLEMENT BETWEEN PLAINTIFFS AND ALL DEFENDANTS

Following the last mediation session on April 27, 2015, the parties reached agreement in principle on a global settlement subject to execution of a written settlement agreement. Plaintiffs recently prepared and distributed a draft settlement agreement to Defendants, which Defendants are reviewing and hope to finalize soon subject to agreement on the last remaining material terms (with the caveat that a notice plan has not yet been concluded, as discussed below).

The Parties have been working diligently to conclude their efforts as soon as reasonably possible, but unfortunately were unable to conclude their work in time to complete all of the settlement papers, including a notice plan, such that a motion for preliminary approval could be filed within 30 days of the Court's order of May 26, 2016 (Dkt. No. 372), per the terms of that order.

Regarding notice, Plaintiffs have consulted, and continue to consult, with notice administration firms toward a plan designed to effect the best notice to settlement class members that is practicable under the circumstances. Completion of the notice plan, and any further efforts as to notice that would be appropriate thereafter, is one of the last significant steps requiring completion before the settlement agreement can be finalized. The parties presently anticipate that the settlement agreement and claims administration plans should be finalized in the next 30 days, with the notice plan to be finalized as soon as reasonably possible. The parties request that the court schedule a

status conference call for July 30, 2015. The parties also respectfully request that the Court stay all deadlines in light of the reported developments. All parties are committed to working expeditiously to complete the settlement and preliminary approval process.

Dated: June 25, 2015

By: /s/ Robert F. Lopez
 Steve W. Berman (*pro hac vice*)
 Robert F. Lopez (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com
 robl@hbsslaw.com

By: /s/ Daniel L. Warshaw
 Daniel L. Warshaw (SBN 185365)
 PEARSON SIMON & WARSHAW, LLP
 15165 Ventura Blvd., Suite 400
 Sherman Oaks, CA 91403
 Telephone: (818) 788-8300
 Facsimile: (818) 788-8104
 dvarshaw@pswlaw.com

Bruce L. Simon (SBN 96241)
 PEARSON SIMON & WARSHAW, LLP
 44 Montgomery Street, Suite 2450
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
 bsimon@pswlaw.com

Plaintiffs' Interim Co-Lead Counsel

By: /s/ Tyler G. Newby
 Rodger R. Cole (CSB No. 178865)
 rcole@fenwick.com
 FENWICK & WEST LLP
 801 California Street
 Mountain View, CA 94041
 Ph: (650) 988-8500
 Fax: (650) 938-5200

Tyler G. Newby (CSB No. 205790)
tnewby@fenwick.com
Jennifer J. Johnson (CSB No. 252897)
jjjohnson@fenwick.com
FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Ph: (415) 875-2300
Fax: (415) 281-1350

Attorneys for Defendant Carrier IQ, Inc.

By: /s/ Rosemarie T. Ring
Rosemarie T. Ring (SBN 220769)
Rose.Ring@mto.com
Jonathan H. Blavin (SBN 230269)
Jonathan.Blavin@mto.com
Bryan H. Heckenlively (SBN 279140)
Bryan.Heckenlively@mto.com
MUNGER, TOLLES & OLSON, LLP
560 Mission Street
Twenty-Seventh Floor
San Francisco, CA 94105-2907
Phone: (415) 512-4000
Fax: (415) 512-4077

Henry Weissmann (SBN 132418)
Henry.Weissmann@mto.com
MUNGER, TOLLES & OLSON, LLP
355 South Grand Avenue,
Thirty-Fifth Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

*Attorneys for Defendants HTC America, Inc.,
and HTC Corporation*

By: /s/ Simon J. Frankel
Simon J. Frankel
sfrankel@cov.com
Katherine R.H. Gasztonyi
kgasztonyi@cov.com
COVINGTON & BURLING LLP
1 Front St., 35th Floor
San Francisco, CA 94111
Phone: (415) 591-6000
Fax: (415) 591-6091

*Attorneys for Defendant Huawei DeviceUSA,
Inc.*

1 By: /s/ Wilson W. Lin
2 Wilson W. Lin (SBN 302228)
3 wlin@park-law.com
4 H.C. Park & Associates, PLC
5 1894 Preston White Drive
6 Reston, VA 20191
7 Phone: (703) 544-9230
8 Fax: (703) 288-5139

Attorneys for Defendant Pantech Wireless, Inc.

7 By: /s/ Lance A. Etcheverry
8 Lance A. Etcheverry (SBN 199916)
9 lance.etcheverry@skadden.com
10 SKADDEN ARPS SLATE MEAGHER &
11 FLOM LLP
12 300 South Grand Avenue, Suite 3400
13 Los Angeles, California 90071
14 Phone: (213) 687-5000
15 Fax: (213) 687-5600

12 S. Sheryl Leung (SBN 238229)
13 sheryl.leung@skadden.com
14 SKADDEN ARPS SLATE MEAGHER &
15 FLOM LLP
16 525 University Avenue, Suite 1400
17 Palo Alto, California 94301
18 Phone: (650) 470-4544
19 Fax: (650) 798-6605

*Attorneys for Defendants Samsung
Telecommunications America, LLC and
Samsung Electronics Co., Ltd.*

19 By: /s/ Jeff E. Scott
20 Jeff E. Scott (SBN 126308)
21 ScottJ@gtlaw.com
22 Lori Chang (SBN 228142)
23 ChangL@gtlaw.com
24 Rebekah Guyon (SBN 291037)
25 GuyonR@gtlaw.com
26 GREENBERG TRAURIG, LLP
27 1840 Century Park East, Suite 1900
28 Los Angeles, CA 90067-2121
Tel: 310-586-7700
Fax: 310-586-7800

Ian C. Ballon (SBN 141819)
Ballon@gtlaw.com
GREENBERG TRAURIG, LLP
1900 University Avenue, 5th Floor
East Palo Alto, CA 94303
Tel: 650-328-8500
Fax: 650-328-8508

*Attorneys for Defendants LG Electronics
MobileComm U.S.A., Inc. and LG Electronics, Inc.*

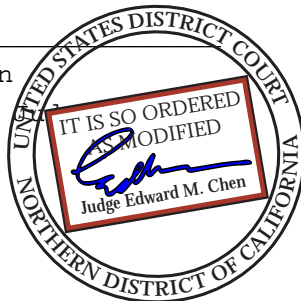
By: /s/ Norman K. Beck
Peter C. McCabe III
pmccabe@winston.com
Norman K. Beck
nbeck@winston.com
Christopher J. Letkewicz
cletkewicz@winston.com
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601-9703
Phone: (312) 558-5600
Fax: (312) 558-5700

Krista M. Enns (SBN 206430)
kenns@winston.com
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111-5894
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Attorneys for Defendant Motorola Mobility LLC

IT IS SO ORDERED that a telephonic status conference is set for 7/30/15 at 11:15 a.m. Parties who wish to appear by phone shall contact Plaintiffs interim Co-Lead counsel Daniel Warshaw by 7/27/15. Mr. Warshaw is directed to set up a conference call with Court Call and inform all parties and the Court by 7/28/15 the dial in number and a list of the names of counsel who will be appearing.

Edward M. Chen
U.S. District



ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Tyler G. Newby, am the ECF User whose identification and password are being used to file this **FURTHER JOINT CASE MANAGEMENT CONFERENCE STATEMENT AND NOTICE OF SETTLEMENT**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 25, 2015

/s/ Tyler G. Newby
Tyler G. Newby

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2015, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

Dated: June 25, 2015

/s/ Tyler G. Newby
Tyler G. Newby